

Ashley M. Simonsen (Bar No. 275203)  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, California 90067  
Telephone: (424) 332-4800  
Facsimile: (424) 332-4749  
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.  
f/k/a Facebook, Inc.; Facebook Holdings, LLC;  
Facebook Operations, LLC; Meta Payments Inc.  
f/k/a Facebook Payments Inc.; Meta Platforms  
Technologies, LLC f/k/a Facebook Technologies,  
LLC; Instagram, LLC; and Siculus LLC f/k/a  
Siculus, Inc.*

*[Additional parties and counsel listed on  
signature pages]*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

*ALL ACTIONS*

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**OMNIBUS SEALING STIPULATION  
REGARDING SUMMARY JUDGMENT  
AND RULE 702 MOTION AND REPLY  
BRIEFS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5, this Court's Order Setting Sealing Procedures (ECF No. 341), and the Court's directive at ECF No. 2598 (docket text), the Parties submit this omnibus sealing stipulation concerning Defendants' summary judgment and Rule 702 motion and reply briefs (not the exhibits thereto). The *opposition* briefs (and some, but not all, exhibits thereto) have already been subject to omnibus sealing filings made on December 10, 2025. *See* ECF Nos. 2532 (omnibus sealing stipulation), 2528 (YouTube's motion to seal), 2529 (Meta's motion to seal), 2530 (TikTok's motion to seal), 2531 (Snap's motion to seal); *see also* ECF No. 2585 (subsequent stipulation regarding Snap's sealing requests). The Court granted the undisputed requests to seal in those filings. *See* ECF Nos. 2544, 2593.

The parties agree that the motion and reply briefs subject to this stipulation may be unsealed in their entirety. Pursuant to ECF No. 341, the parties attach here unredacted versions of those briefs. For ease of the Court's reference, the Parties list below the briefs subject to this stipulation:

Filing	MDL ECF No.	District-Specific ECF No.
Motion for Summary Judgment (Breathitt)	2288	44
Motion for Summary Judgment (Tucson)	2290	16
Motion for Summary Judgment (Charleston)	2293	23
Motion for Summary Judgment (Irvington)	2294	37
Motion for Summary Judgment (DeKalb)	2289	30
Motion for Summary Judgment (Harford)	2296	24
Motion to Exclude General Causation Testimony of Plaintiffs' Experts	2295	N/A
Motion to Exclude Testimony of School District Experts	2291	N/A

1 2	Reply ISO Motion for Summary Judgment (Irvington)	2520	43
3 4	Reply ISO Motion for Summary Judgment (DeKalb)	2518	35
5 6	Reply ISO Motion for Summary Judgment (Harford)	2511	30

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**IT IS SO STIPULATED AND AGREED.**

1 Dated: January 14, 2026

2 **COVINGTON & BURLING LLP**

3 /s/ Ashley M. Simonsen

4 ASHLEY M. SIMONSEN (Bar No. 275203)

5 COVINGTON & BURLING LLP

6 1999 Avenue of the Stars

7 Los Angeles, California 90067

8 Telephone: (424) 332-4800

9 Facsimile: (424) 332-4749

10 Email: asimonsen@cov.com

11 PHYLLIS A. JONES (*pro hac vice*)

12 PAUL W. SCHMIDT (*pro hac vice*)

13 CHRISTIAN J. PISTILLI (*pro hac vice*)

14 COVINGTON & BURLING LLP

15 One City Center

16 850 Tenth Street, NW

17 Washington, DC 20001-4956

18 Telephone: (202) 662-6000

19 Facsimile: (202) 662-6291

20 Email: pajones@cov.com

21 Email: pschmidt@cov.com

22 Email: cpistilli@cov.com

23 *Attorneys for Defendants Meta Platforms, Inc. f/k/a*

24 *Facebook, Inc.; Facebook Holdings, LLC;*

25 *Facebook Operations, LLC; Meta Payments Inc.*

26 *f/k/a Facebook Payments Inc.; Meta Platforms*

27 *Technologies, LLC f/k/a Facebook Technologies,*

28 *LLC; Instagram, LLC; and Siculus LLC f/k/a*

*Siculus, Inc.*

**WILLIAMS & CONNOLLY LLP**

/s/ Ashley W. Hardin

JOSEPH G. PETROSINELLI, *pro hac vice*

jpetrosinelli@wc.com

ASHLEY W. HARDIN, *pro hac vice*

ahardin@wc.com

J. ANDREW KEYES, *pro hac vice*

akeyes@wc.com

NEELUM J. WADHWANI (SBN 247948)

nwadhwani@wc.com

WILLIAMS & CONNOLLY LLP

680 Maine Avenue SW

Washington, DC 20024

Tel.: (202) 434-5000

*Attorneys for Defendants YouTube, LLC and  
Google LLC*

**KING & SPALDING LLP**

/s/ Bailey J. Langner

GEOFFREY M. DRAKE, *pro hac vice*

*gdrake@kslaw.com*

TACARA D. HARRIS, *pro hac vice*

*tharris@kslaw.com*

KING & SPALDING LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309

Telephone: (404) 572-4600

Facsimile: (404) 572-5100

DAVID P. MATTERN, *pro hac vice*

*dmattern@kslaw.com*

KING & SPALDING LLP

1700 Pennsylvania Avenue, NW

Suite 900

Washington, D.C. 20006

Telephone: (202) 737-0500

Facsimile: (202) 626-3737

BAILEY J. LANGNER (SBN 307753)

*blangner@kslaw.com*

KING & SPALDING LLP

50 California Street, Suite 3300

San Francisco, CA 94111

Telephone: (415) 318-1200

Facsimile: (415) 318-1300

*Attorneys for Defendants TikTok Inc., ByteDance  
Inc., ByteDance Ltd., TikTok Ltd., and TikTok, LLC*

**MUNGER, TOLLES & OLSON LLP**

/s/ Victoria A. Degtyareva  
JONATHAN H. BLAVIN (State Bar No. 230269)  
Jonathan.Blavin@mto.com  
MUNGER, TOLLES & OLSON LLP  
560 Mission Street, 27th Floor  
San Francisco, CA 94105  
Tel: (415) 512-4000

VICTORIA A. DEGTYAREVA (State Bar No.  
284199)  
Victoria.Degtyareva@mto.com  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071  
Tel.: (213) 683-9100  
Facsimile: (213) 687-3702

**KIRKLAND & ELLIS LLP**

ALLISON BROWN, *pro hac vice*  
alli.brown@kirkland.com  
KIRKLAND & ELLIS LLP  
2005 Market Street, Suite 1000  
Philadelphia, PA 19103  
Tel.: (215) 268-5000

JESSICA DAVIDSON, *pro hac vice*  
jessica.davidson@kirkland.com  
JOHN J. NOLAN, *pro hac vice*  
jack.nolan@kirkland.com  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Tel.: (212) 446-4800

*Attorneys for Defendant Snap Inc.*

By: /s/ Lexi J. Hazam  
PREVIN WARREN  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610

pwarren@motleyrice.com

LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 BATTERY STREET, 29TH FLOOR  
SAN FRANCISCO, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

*Co-Lead Counsel for Plaintiffs*

**ROB BONTA**  
Attorney General  
State of California

By: /s/ Megan O'Neill  
Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (SBN 244395)  
Emily Kalanithi (SBN 256972)  
Supervising Deputy Attorneys General  
Nayha Arora (CA SBN 350467)  
David Beglin (CA SBN 356401)  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer (CA SBN  
336428)  
Marissa Roy (CA SBN 318773)  
Brendan Ruddy (CA SBN 297896)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
Joshua.OlszewskiJubelirer@doj.ca.gov

*Attorneys for Plaintiff the People of the State  
of California*

PHILIP J. WEISER  
Attorney General  
State of Colorado  
By: /s/ Krista Batchelder  
Krista Batchelder, CO Reg. No. 45066, *pro  
hac vice*



1 Deputy Solicitor General  
2 Shannon Stevenson, CO Reg. No. 35542, *pro*  
3 *hac vice*  
4 Solicitor General  
5 Elizabeth Orem, CO Reg. No. 58309, *pro hac*  
6 *vice*  
7 Assistant Attorney General  
8 Colorado Department of Law  
9 Ralph L. Carr Judicial Center  
10 Consumer Protection Section  
11 1300 Broadway, 7th Floor  
12 Denver, CO 80203  
13 Phone: (720) 508-6651  
14 krista.batchelder@coag.gov  
15 Shannon.stevenson@coag.gov  
16 Elizabeth.orem@coag.gov

17 *Attorneys for Plaintiff State of Colorado, ex*  
18 *rel. Philip J. Weiser, Attorney General*

19 **RUSSELL COLEMAN**  
20 Attorney General  
21 Commonwealth of Kentucky

22 By: /s/ Philip Heleringer  
23 J. Christian Lewis (KY Bar No. 87109),  
24 *Pro hac vice*  
25 Philip Heleringer (KY Bar No. 96748),  
26 *Pro hac vice*  
27 Zachary Richards (KY Bar No. 99209),  
28 *Pro hac vice*  
Daniel I. Keiser (KY Bar No. 100264),  
*Pro hac vice*  
Matthew Cocanougher (KY Bar No. 94292),  
*Pro hac vice*  
Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
CHRISTIAN.LEWIS@KY.GOV  
PHILIP.HELERINGER@KY.GOV  
ZACH.RICHARDS@KY.GOV  
DANIEL.KEISER@KY.GOV  
MATTHEW.COCANOUGHER@KY.GOV  
Phone: (502) 696-5300  
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of*  
*Kentucky*

**MATTHEW J. PLATKIN**

Attorney General  
State of New Jersey

By: /s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008),

*Pro hac vice*

Attorney General

Thomas Huynh (NJ Bar No. 200942017),

*Pro hac vice*

Assistant Section Chief, Deputy Attorney  
General

Verna J. Pradaxay (NJ Bar No. 335822021),

*Pro hac vice*

Mandy K. Wang (NJ Bar No. 373452021),

*Pro hac vice*

Deputy Attorneys General

New Jersey Office of the Attorney General,

Division of Law

124 Halsey Street, 5th Floor

Newark, NJ 07101

Tel: (973) 648-2052

Kashif.Chand@law.njoag.gov

Thomas.Huynh@law.njoag.gov

Verna.Pradaxay@law.njoag.gov

Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs New Jersey Attorney  
General and the New Jersey Division of  
Consumer Affairs Matthew J. Platkin,  
Attorney General for the State of New Jersey,  
and Elizabeth Harris, Acting Director of the  
New Jersey Division of Consumer Affairs*

**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 14, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen